

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

WALTER CHOW, as Administrator of the Estate of LEROY CHOW, individually and on behalf of all others similarly situated,

Plaintiff,

v.

SHOREFRONT OPERATING LLC d/b/a SEAGATE REHABILITATION AND NURSING CENTER; SHAINDY BERKO; ROCHEL DAVID; LEAH FRIEDMAN; DEENA LANDA; ESTHER FARKOVITZ; AVI PHILIPSON; BERISH RUBINSTEIN; DAVID RUBINSTEIN; BRUSCHA SINGER; JOEL ZUPNICK; SHOREFRONT REALTY LLC; SENTOSACARE, LLC; and DOES 1-25,

Defendants.

**Civil Action No.  
1:19-cv-03541-FB-SJB**

**NOTICE OF MOTION FOR RECONSIDERATION**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, dated October 2, 2020, and the docket entries cited therein, Defendants will move this Court before the Honorable Frederic Block, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by this Court, for an Order to be entered pursuant to Local Civil Rule 6.3 of the Southern and Eastern Districts of New York and Rule 60(b) of the Federal Rules of Civil Procedure, granting reconsideration of this Court's September 25, 2020 Memorandum and Order, ECF No. 69, that denied Defendants' Motion to Dismiss.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), Plaintiff's opposition memorandum, if any, shall be served on or before October 16, 2020, and Defendants' reply memorandum, if any, shall be served on or before October 19, 2020, or as otherwise may be agreed between the parties and approved by this Court.

Dated: October 2, 2020

WILSON, ELSER, MOSKOWITZ, EDELMAN &  
DICKER LLP

/s/ David M. Ross, Esq.

Lori R. Semlies, Esq.  
1133 Westchester Avenue  
White Plains, NY 10604  
Telephone: 914.323.7000  
Facsimile: 914.323.7001  
lori.semlies@wilsonelser.com

David M. Ross, *Admitted Pro Hac Vice*  
1500 K Street, N.W., Suite 330  
Washington, DC 20005  
Telephone: (202) 626-7687  
Facsimile: (202) 628-3606  
david.ross@wilsonelser.com

*Attorneys for all Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Notice and accompanying Memorandum was served on all counsel of record via ECF on October 2, 2020.

/s/ David M. Ross, Esq.

David M. Ross